

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

**DARLENE GIBBS, *et al.*,
on behalf of themselves and all
individuals similarly situated,**

Plaintiffs,

v.

Civil Action No. 3:20-CV-632-MHL

ELEVATE CREDIT, INC.

Defendant.

**JOINT CONSENT MOTION FOR ENTRY
OF STIPULATED PROTECTIVE ORDER**

Plaintiffs, Darlene Gibbs, Kimetra Brice, Earl Browne, Sharon Burney, and Stephanie Edwards, on behalf of themselves and all others similarly situated (“Plaintiffs”) and Defendant Elevate Credit, Inc. (“Elevate”) (collectively, the “Parties), through their respective attorneys of record, hereby move this Honorable Court pursuant to Federal Rule of Civil Procedure 26(c)(1) for an order protecting the disclosure of confidential information. The Parties’ have agreed to the proposed Stipulated Protective Order attached as Exhibit “1” to this Motion.

For all the foregoing reasons, Plaintiffs and Defendant respectfully request that the Court grant their Motion and enter the proposed protective order.

Dated: January 25, 2022

Respectfully submitted,
KELLY GUZZO, PLC

By: /s/Kristi Cahoon Kelly
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